BRADLEY/GROMBACHER, LLP 1 Marcus J. Bradley, Esq. (SBN 174156) Kiley L. Grombacher, Esq. (SBN 245960) 2815 Townsgate Road, Suite 130 Westlake Village, California 91361 (805) 270-7100 Telephone: Facsimile: (805) 270-7589 4 mbradley@bradleygrombacher.com kgrombacher@ bradleygrombacher.com ROTHSCHILD & ALWIL, APC 6 Kristi D. Rothschild, Esq. (SBN 222727) Julian Alwill, Esq. (SBN 259416) 27 W. Anapamu Street, Suite 289 Santa Barbara, California 93101 Telephone: (805) 845-1190 Facsimile: (805) 456-0132 krothschild@kdrlawgroup.com jalwill@kdrlawgroup.com 10 Attorneys for Plaintiff 11 12 13 UNITED STATES DISTRICT COURT 14 CENTRAL DISTRICT OF CALIFORNIA 15 Case No.: 2:18-CV-04916 PA (AFMx) ANDREA RIDGELL, on behalf of herself and others similarly situated 16 **DECLARATION OF KILEY L.** Plaintiff. **GROMBACHER IN SUPPORT OF** 17 MOTION FOR CLASS v. 18 **CERTIFICATION** FRONTIER AIRLINES, INC. a Colorado 19 corporation; AIRBUS S.A.S., a foreign **DATE:** 11/19/18 corporation doing business in the State of TIME: 1:30 p.m. 20 California; AIRBUS GROUP HQ INC., a DEPT: 9A corporation doing business in the State of 21 California Defendants. 22 23 24 25 26 27 28

I, Kiley Lynn Grombacher, declare as follows:

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26 27 Shortly after filing, Plaintiff caused the complaint and all initiating 11.

documents to be translated into French.

- I am an attorney duly admitted to practice law before this Court and I am a member in good standing of the State Bar of California, the State Bar of Tennessee, and in the Third and Ninth Circuits.
- 2. I am a named partner at Bradley/Grombacher, LLP counsel for Andrea Ridgell ("Plaintiff").
- In my capacity as counsel, I have been actively involved with all aspects of this litigation. Accordingly, I have personal knowledge of all the matters set forth herein, and if called, I could and would competently testify to the following:
- This Declaration is submitted in support of the Motion for Class Certification, and specifically to address the adequacy of Bradley/Grombacher LLP, to be appointed class counsel by this Court.

RELEVANT PROCEDURAL HISTORY

- Plaintiff filed this action on June 1, 2018. 5.
- 6. Pursuant to Local Rule 23-3, the deadline for the filing of Plaintiff's motion for class certification was September 13, 2018. Currently, by Order of the Court the current deadline is October 22, 2018.
 - Plaintiff served defendant Frontier on or about June 15, 2018. 7.
- 8. As a professional courtesy to Frontier, Plaintiff stipulated to provide Frontier an additional thirty-nine (39) days in which to file an answer to the complaint. Frontier filed an answer to the complaint on August 14, 2018.
- 9. Plaintiff voluntarily dismissed defendant Airbus Group HQ, Inc., pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i) on July 16, 2018.
- Given that defendant Airbus S.A.S. ("Airbus") is a foreign corporation, 10. service must be effectuated through protocols established by the Hauge Convention.

- 12. Promptly upon translation, Plaintiff began the process of effectuating service under the Hague Convention with the assistance of ABC Legal, a process serving company.
- 13. In accordance with required procedures, the service request was sent to the Ministry de la Justice in Paris with confirmed receipt on July 16, 2018.
- 14. At present, service has not yet been confirmed and may take several more weeks or months to be effectuated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my personal knowledge. This declaration is executed this 22nd day of October, 2018, at Westlake Village, California.

/s/ Kiley Lynn Grombacher Kiley Lynn Grombacher, Esq.